

**PSJ14 Janssen Opp Exh 42 – Cartwright Dep (dep not cited in  
appendices)**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

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IN RE: NATIONAL : HON. DAN A.  
PRESCRIPTION OPIATE POLSTER

6 LITIGATION : MDL NO. 2804

7 APPLIES TO ALL CASES : NO. 1:17-MD-2804

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10 HIGHLY CONFIDENTIAL

11 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

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14 January, 17, 2019

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Videotaped deposition of CARLA CARTWRIGHT,  
taken pursuant to notice, held at the law offices of  
O'Melveny & Myers, LLP, 1625 Eye Street, N.W.,  
Washington, D.C., beginning at 9:14 a.m., before  
Misty Klapper, Registered Merit Reporter, Certified  
Realtime Reporter and Notary Public in and for the  
District of Columbia.

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1 Healthcare Organizations. And I -- this is  
2 the -- I assume the organization you were  
3 trying to refer to earlier?

4 A. It is.

5 Q. And informally I'm going to  
6 refer to this organization as JCAHO.

7 A. I will do the same.

8 Q. That's -- that's perfect. Yeah.  
9 I just wanted to make sure you understood what  
10 I was referring to.

11 A. Um-hmm (affirmative).

12 Q. What is JCAHO?

13 A. So it's an accreditation  
14 organization for, you know, all kinds of  
15 hospitals, and they provide guidelines and  
16 best practices in addition.

17 Q. Has J&J participated in any  
18 lobbying efforts or governmental affairs  
19 activities related to JCAHO's pain standards  
20 for hospital accreditation?

21 A. So it's my understanding that we  
22 received a request from them to help support  
23 development of the monograph and that we did  
24 so.

1 Q . And when was this request  
2 received?

3 A . I believe — you know , at this  
4 moment it is not coming to me . I'll let you  
5 know if I can pull it up —

6 Q . Okay.

7 A . — that date .

8 Q . Are there — who were the  
9 individuals involved with this effort?

10 A . They were individuals from our  
11 medical affairs group .

12 Q . Do you know the names of any  
13 Janssen employees specifically?

14 A . I believe Bruce Moskowitz and  
15 Gary Vorsanger may have been involved in this  
16 as well .

17 Q . Okay . You said it was a — a  
18 request to support the development of a  
19 monograph .

20 Did that monograph have a title  
21 or a name ?

22 A . I don't know the specific title .  
23 I believe there was an initial monograph and  
24 then a few years later — a follow-on .

1 Q . Okay. And what specifically did  
2 that monograph address?

3 A . I— I think it was related to  
4 pain management specifically.

5 Q . I understand you didn't— you  
6 don't remember the date.

7 Is this a recent effort or was  
8 this earlier?

9 A . I— I'm thinking early 2000s —

10 Q . Okay.

11 A . —but don't recall the exact  
12 year.

13 Q . It predated your joining J&J,  
14 though; is that correct?

15 A . Yes.

16 Q . Okay.

17 A . That's my understanding.

18 Q . We're going to —

19 MR . ACKERMAN : Do we have a  
20 stapler in here?

21 MR . GALIN : There's probably one  
22 in the back left corner of that.

23 MR . ACKERMAN : So there are a  
24 set of documents that were produced by Janssen

1 as a family, and I want to make sure I keep  
2 them together, hopefully in the right order,  
3 so --

4 MR. GALIN: It seems like  
5 there's a political joke to be made here.

6 MR. ACKERMAN: We will mark that  
7 as the next exhibit.

8 (Thereupon, J&J-Cartwright  
9 Deposition Exhibit Number 8 was marked  
10 for identification.)

11 THE WITNESS: Thank you.

12 BY MR. ACKERMAN:

13 Q. Ms. Cartwright, the court  
14 reporter has handed you what is marked as  
15 Exhibit Number 8. It is a multi-page document  
16 with Bates numbers JAN-M S -00654707 through  
17 -711. I'll note that two of the documents  
18 that were attachments to this E-mail were  
19 produced to us in native form, and so we've  
20 included the slip sheet and the native files  
21 in this document.

22 Take a moment to review the  
23 document. Let me know when you've had a  
24 chance to review it.

1 MR .ACKERMAN : Counsel, I would  
2 note that the page at 654708 is noted to be  
3 withheld as not responsive . I don't know  
4 whether that's because it was -- I -- I don't  
5 know why that is, but I'd ask you to look into  
6 that.

7 MR .GALIN : I don't know why  
8 that is either, but I will look into it as  
9 well.

10 MR .ACKERMAN : Okay. Thank you.

11 MR .GALIN : I'm just not -- I  
12 just want to make sure I'm -- oh, okay.

13 BY MR .ACKERMAN :

14 Q . Have you reviewed it?

15 A . At a high level, yes.

16 Q . Okay. Sure.

17 Have you seen this document  
18 before?

19 A . I believe I've seen parts of  
20 this document.

21 Q . Okay. Which parts of the  
22 document have you seen?

23 A . I believe I've seen the last  
24 page, 654711.

1 Q . Okay. Is this — if you turn  
2 back to the first page, the subject matter of  
3 this E-mail says, JCAHO pain management, Jean  
4 Gillespie.

5 Is this E-mail referring to the  
6 pain management project that you testified to  
7 earlier?

8 A . I believe so, yes.

9 Q . Okay. And the E-mail says or  
10 appears to ask Gary Vorsanger to take the lead  
11 on the project.

12 Did — did Gary Vorsanger, in  
13 fact, take the lead on this — this project?

14 A . I believe that's the case.

15 Q . Okay. Did Janssen provide any  
16 financial support to JCAHO in connection with  
17 the drafting or promotion of its pain  
18 management standards?

19 A . It's my understanding that we  
20 did provide funding.

21 Q . Okay. When?

22 A . So in preparing, I think it was  
23 a little difficult for us to determine exactly  
24 when and — and over what time period, but I



1 believe in the early 2000s.

2 Q . Okay. And approximate — or do  
3 you know how much funding was provided?

4 A . I believe it was 50,000, but I'm  
5 not sure if that was just — just that or —  
6 or maybe there was another time period  
7 involved, too.

8 Q . Okay. Was the 50,000 in a  
9 single payment or in multiple payments?

10 A . That I do not know .

11 Q . Okay. Do you know — okay.

12 Other than Mr. Moskowitz and  
13 Mr. Vorsanger, was anyone else at J&J involved  
14 in this JCAHO pain management effort?

15 A . I believe some others who, you  
16 know, might have reported to them or been —  
17 you know, others in — in medical affairs may  
18 have had some involvement in, you know,  
19 providing scientific input.

20 Q . Okay. Specifically, do you know  
21 who?

22 A . I do not.

23 Q . All right. Why did J&J become  
24 involved in increasing awareness of the JCAHO

1 guidelines in pain — pain management?

2 A. Well, I believe that we feel  
3 like it's important to ensure that people who  
4 are suffering from pain have adequate access  
5 to appropriate treatments and that education  
6 is — is a — you know, a good thing in —  
7 in — in the different product areas and  
8 disease areas where we work.

9 And so it would not be, you  
10 know, atypical for us to provide funding or,  
11 you know, want to have a seat at the table  
12 when something like this was sort of being  
13 discussed and — and proposed.

14 Q. When you say adequate access to  
15 appropriate treatments, does that include the  
16 prescribing of Janssen — or J&J's opioid  
17 products?

18 A. Well, it could, depending on the  
19 decision of the appropriate, you know, medical  
20 professional.

21 Q. Okay. Did the JCAHO guidelines  
22 in pain management — strike that. Okay.

23 Let's move on to the next topic,  
24 which is 25 (f). And this is lobbying efforts